

UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

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HUZHOU CHUANGTAI RONGYUAN :  
INVESTMENT MANAGEMENT :  
PARTNERSHIP, HUZHO HUIHENG YING :  
EQUITY INVESTMENT PARTNERSHIP, and :  
HUZHOU HUIRONGSHENG EQUITY :  
INVESTMENT PARTNERSHIP, :  
:

Petitioners,

v.

HUI QIN,

Respondent.  
-----X

21 Civ. 9221 (KPF)

**DECLARATION OF CAROL LEE IN SUPPORT OF PETITIONERS'/JUDGMENT-  
CREDITORS' MEMORANDUM OF LAW IN OPPOSITION TO XUE & ASSOCIATES,  
P.C.'S MOTION TO QUASH**

I, Carol Lee, declare as follows:

1. I am an attorney at Pillsbury Winthrop Shaw Pittman LLP ("Pillsbury"). Pillsbury represents Petitioners Huzhou Chuangtai Rongyuan Investment Management Partnership, Huzhou Huihengying Equity Investment Partnership, and Huzhou Huirongsheng Equity Investment Partnership (collectively, "Petitioners") in the above-captioned.

2. I am licensed and in good standing to practice law in the State of New York.

3. I submit this declaration in support of Petitioners'/Judgment-Creditors' Opposition to Xue & Associates, P.C.'s Motion to Quash.

4. On November 18, 2022, this Court held a hearing on Xue & Associates, P.C.'s motion to withdraw as counsel for the Respondent.

5. Respondent's current counsel, Mr. Kushner of Seiden Law Group, and former counsel, Mr. Xue of Xue & Associates, P.C., both appeared at the hearing.



6. At the November 18 hearing, Mr. Kushner argued that the Court should allow Mr. Xue's firm to withdraw as counsel because Petitioners will be getting documents from his firm and Mr. Xue's firm in response to the subpoenas Petitioners served on these two firms. Mr. Kushner argued that because Petitioners will be getting documents from Mr. Xue pursuant to the subpoena, there is no need to keep Mr. Xue in the case. Mr. Xue did not object to Mr. Kushner's representation or request to quash the subpoenas. The Court granted Mr. Xue's motion to withdraw as counsel.

7. Attached hereto as **Exhibit A** is a true and correct copy of an email from Petitioners' counsel, Andrew C. Smith, to Chris Harwood, counsel to Agricultural Bank of China dated November 2022.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed on December 2, 2022.

/s/ Carol Lee  
Carol Lee